

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION

JERRY McLEOD,

Plaintiff,

v.

MIKE DEWEY and MIKE BASS,

Defendants.

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Civil Action No. 7:20-cv-244

**DECLARATION OF BRADLEY J. WATKINS**

PERSONALLY APPEARED before the undersigned officer duly authorized to administer oaths under the laws of the State of Georgia, **Bradley J. Watkins**, who, after being sworn on oath, deposes and states as follows:

1. I have personal knowledge of the facts stated in this Declaration. I am over twenty-one (21) years of age. I am under no legal disability, and I am competent to make this Declaration.

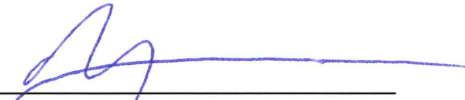
2. I currently lead counsel for the Defendants in this action.

3. On or about January 23, 2023, Defendants served Requests for Admissions (“RFAs”) on Plaintiff. A true and correct copy of the RFAs served on Plaintiff are attached to Defendants’ Memorandum of Law in support of Defendants’ Motion for Summary Judgment. *See Ex. C to Defs.’ Memo. of Law in Support of MSJ.*

4. Plaintiff failed to respond to Defendants’ RFAs and Defendants have never received any response to this discovery request.

[Signature on following page]

This 5th day of February 2024.

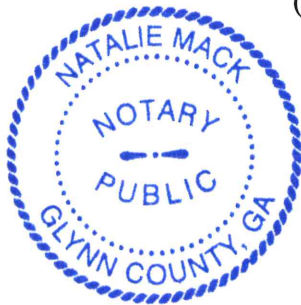
  
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Bradley J. Watkins  
*Attorney for Defendants*

Sworn to and subscribed before me this

5<sup>th</sup> day of February, 2024.

  
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Natalie Mack  
Notary Public

(SEAL)



Notary Public, Glynn County, Georgia  
My commission expires November 21, 2026